

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RECLAIM THE RECORDS and ALEC
FERRETTI,

Plaintiffs,

- against -

UNITED STATES DEPARTMENT OF STATE,

Defendant.

No. 23-CV-1650

**DECLARATION OF
DAVID B. RANKIN
IN OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT AND IN
SUPPORT OF CROSS-MOTION
FOR SUMMARY JUDGMENT**

I, David B. Rankin, an attorney duly licensed to practice law in this Court, pursuant to 28 U.S.C. § 1746, do hereby declare under penalties of perjury:

1. I am a partner at Beldock Levine & Hoffman LLP, attorneys for Plaintiffs and am well-familiar with the facts of this case. I submit this declaration in opposition to Defendant's Motion for Summary Judgment and in support of Plaintiffs' Cross-Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

2. Annexed hereto are true and accurate copies of the following exhibits:

- a. Exhibit A: Plaintiff's FOIA request to the Department of State dated June 28, 2021.
- b. Exhibit B: Defendant's letter acknowledging Plaintiff's request dated April 3, 2023.
- c. Exhibit C: Privacy Impact Assessment, Passport Information Electronic Records System (PIERS), dated 10/2020, *downloaded from* <https://www.state.gov/wp-content/uploads/2020/11/Passport-Information-Electronic-Records-System-PIERS-PIA.pdf> (last accessed March 27, 2024).

Dated: March 28, 2024
New York, New York

Respectfully submitted,

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By: _____

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